

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

SHAUN CORDEIRO and KEVIN
MATLOCK, *individually and on
behalf of all others similarly situated,*

Plaintiffs,

v.

GREP ATLANTIC, LLC, and EDDY
OWNER, L.L.C.

Defendants.

CASE NO.: 1:23-CV-12901-AK

**JOINT MOTION TO ENTER PROPOSED STIPULATION AND ORDER
FOR THE PRODUCTION OF DOCUMENTS AND ELECTRONICALLY
STORED INFORMATION**

Plaintiffs Shaun Cordeiro and Kevin Matlack (“Plaintiffs”) and Defendants GREP Atlantic LLC and Eddy Owner, L.L.C. (“Defendants”) (collectively, the “Parties”), by and through counsel, respectfully move this Court to enter the proposed: (1) Confidentiality and Protective Order; and (2) Stipulation and Order for the Production of Documents and Electronically Stored Information, attached hereto as Exhibits A and B. The parties have conferred regarding how discovery should be conducted in this lawsuit and have agreed on these two proposed orders, which the parties now jointly present for entry by the Court for good cause shown pursuant to Federal Rules of Civil Procedure 26(c) and 34.

Date: September 18, 2025

Respectfully submitted,

**GREP ATLANTIC, LLC, and EDDY OWNER,
L.L.C.**

/s/ Brandon L. Arber

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